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April 16, 2020

VIA CM/ECF

The Honorable Valerie E. Caproni
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/17/2020

Re: *Grublis v. OneCoin Ltd. et. al.*, Case No. 1:19-cv-4074

Dear Judge Caproni:

We write on behalf of Lead Plaintiff Donald Berdeaux and Plaintiff Christine Grublis (together, "Plaintiffs") in the above-captioned matter (the "Action"). Earlier this afternoon, we responded to the Court's Order to Show Cause dated April 10, 2020 (ECF No. 91) explaining why the Court should not dismiss this action for failure to prosecute. In pertinent part, Plaintiffs have invested a significant amount of time and effort into this Action, completed service on all remaining defendants at this time, and are prepared to proceed with the litigation expeditiously.

Provided that the Court allows Plaintiffs to proceed with this matter, Plaintiffs respectfully request that the stay currently in place in this Action be lifted and that the Court schedule a telephonic conference to discuss next steps.

Counsel for Plaintiffs are available at the Court's convenience.

SO ORDERED.

cc: All Counsel of Record (via CM/ECF) Respectfully submitted,

s/ Adam M. Apton

Adam M. Apton

Valerie Caproni
4/17/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

WHEREAS on August 23, 2019, the Court stayed this proceeding until all Defendants have been served and ordered that "[o]nce all Defendants have been served and Lead Plaintiff has posted proof of such service on ECF, Lead Plaintiff must so notify the Court by letter, which anticipates scheduling a conference to discuss next steps" (Dkt. 46);

WHEREAS on April 10, 2020, the Court ordered Lead Plaintiff to show cause why this case should not be dismissed for failure to prosecute (Dkt. 91);

WHEREAS Lead Plaintiff has shown cause why this case should continue and has served all remaining Defendants;

IT IS HEREBY ORDERED that a teleconference to discuss next steps is tentatively scheduled for **May 1, 2020, at 11:00 a.m.** (Dial-in: (888) 363-4749 // Access code: 3121171# // Security code: 4074#). The parties must submit a joint letter no later than **April 27, 2020**, proposing next steps and stating whether they believe a teleconference is necessary at all. In this joint letter, Defendants must state whether they object to lifting the stay on this case and why.